From: paul allen
To: Contact OGE
Subject: Proposed Rule: Legal Expense Fund Regulation (RIN 3209-AA50)
Date: Thursday, June 16, 2022 9:31:07 PM

Dear sirs/madams:

I oppose OGE's proposed legal expense fund regulation as drafted. OGE should:

1. Remove the exception that makes compliance with the regulation optional. For a rule designed to reduce corruption or the appearance thereof to be optional is, bluntly, ridiculous.
2. Replace the proposed recusal requirement with a broader 5-year recusal requirement that prevents donors of cash gifts from influencing decisions, policies, or regulations affecting them or the industries in which they have substantial interests.
3. Remove the offensive example involving an accused sexual harasser. Read the room, people.
4. Place nonprofit charities (501(c)(3) organizations) on an equal footing with large law firms by allowing them to hire legal counsel for whistleblowers.

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From Paul's phone